

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERICK CAFFARELLO, on behalf of himself and)
on behalf of all others similarly situated,)

Plaintiff,

V.

ADS LOGISTICS CO., LLC

Defendant.

JURY TRIAL DEMANDED

No. 1:12-cv-08300

Hon. Thomas M. Durkin

UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF PROPOSED CLASS ACTION SETTLEMENT

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiff Erick Caffarello, individually and on behalf of all others similarly situated, by and through his counsel, hereby respectfully moves this Court for Preliminary Approval of Proposed Settlement, issuance of Notice to the Settlement Class, and Conditional Settlement Class Certification for the reasons set forth in Plaintiff's Memorandum in Support of Unopposed Motion for Preliminary Approval of Proposed Class Action Settlement.

Defendant ADS Logistics Co., LLC does not oppose this Motion.

Dated: July 23, 2014

Respectfully submitted,

Erick Caffarello, on behalf of himself and all similarly situated persons

/s/ Mark A. Bulgarelli

Mark A. Bulgarelli, Esq.

Ilan Chorowsky, Esq.

PROGRESSIVE LAW GROUP LLC

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CERTIFICATE OF SERVICE

I, Mark A. Bulgarelli, hereby certify that I caused a copy of the foregoing Unopposed Motion for Preliminary Approval of Class Action Settlement to be filed electronically with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record for all parties on July 23, 2014.

By: s/ Mark A. Bulgarelli